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8
UNITED STATES BANKRUPTCY COURT
 9
DISTRICT OF NEVADA

10 In Re:
 11 USA COMMERCIAL MORTGAGE
 COMPANY,
 13 USA CAPITAL REALTY ADVISORS, LLC,
 USA CAPITAL DIVERSIFIED TRUST DEED
 FUND, LLC, USA CAPITAL FIRST TRUST
 15 DEED FUND, LLC, USA SECURITIES, LLC,
 Debtors.

Case No. BK-S-06-10725-LBR
 Case No. BK-S-06-10726-LBR
 Case No. BK-S-06-10727-LBR
 Case No. BK-S-06-10728-LBR
 Case No. BK-S-06-10729-LBR

16 **Affects:**
 17 All Debtors
 USA Commercial Mortgage Company
 USA Capital Realty Advisors, LLC
 USA Capital Diversified Trust Deed Fund,
 19 LLC
 USA Capital First Trust Deed Fund, LLC
 USA Securities, LLC

CHAPTER 11
 Jointly Administered Under
 Case No. BK-S-06-10725 LBR

**STIPULATION TO EXTEND
 DEADLINE TO FILE COMPLAINT
 TO AVOID AND RECOVER PRE-
 PETITION TRANSFERS PURSUANT
 TO 11 U.S.C. §§ 547, 548 AND 550**

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 22 USACM Liquidating Trust (the “Trust”), and Beadle McBride Evans & Reeves
 23 (“Beadle McBride,” together with the Trust, the “Parties”), by and through their
 24 undersigned counsel, hereby stipulate to extend the deadline for the Trust to file a

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**LEWIS
AND
ROCA
LLP**

L A W Y E R S

1 complaint to avoid and recover pre-petition transfers pursuant to 11 U.S.C. §§ 547, 548,
2 and 550 (the “Stipulation”) against Beadle McBride. In support of this Stipulation, the
3 Parties state as follows:

4 1. The Trust asserts that it has claims against Beadle McBride for the
5 avoidance and recovery of preferential and/or fraudulent pre-petition transfers (the
6 “Transfers”) received from USA Commercial Mortgage (“USACM”) by Beadle McBride
7 during the 90-day period preceding the filing of USACM’s chapter 11 bankruptcy case on
8 April 13, 2006 (the “Petition Date”).

9 2. On February 12, 2008, in pursuit of its avoidance claims, the Trust made
10 demand upon Beadle McBride for the return of the Transfers. Counsel for Beadle
11 McBride responded to the Trust’s demand with a general denial of the Trust’s
12 characterization of the Transfers.

13 3. The Trust has requested additional information from Beadle McBride
14 regarding the Transfers and the services Beadle McBride provided to USACM pre-
15 petition. The current deadline for the Trust to file a complaint to avoid and recover the
16 Transfers, pursuant to 11 U.S.C. §§ 547, 548, and 550 (the “Complaint”), is April 12,
17 2008.

18 4. In order for Beadle McBride to provide the Trust with the requested
19 information and so that the Trust should have sufficient time to analyze the information
20 provided by Beadle McBride, the Parties have agreed that an extension of the deadline for
21 filing a Complaint is warranted.

22 5. The Parties submit that an extension to Friday, May 30, 2008, of the
23 deadline for filing a Complaint is reasonable and will effectively conserve the Court’s
24 valuable resources and serve the efficiencies of this matter by facilitating the exploration
25 of a resolution of the Trust’s avoidance claims against Beadle McBride.

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LAWYERS

1 WHEREFORE, the Parties request that the Court enter an order approving this
2 Stipulation and extending the deadline, to and including Friday, May 30, 2008, for the
3 Trust to file a Complaint against Beadle McBride.

4 Respectfully submitted:

5 **LEWIS AND ROCA LLP**

6 By /s/ Susan Freeman

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12 DATED 4/9/2008

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DATED 4/9/2008

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